

FILED

MAY 08 2024

Heidi D. Campbell, Clerk
U.S. DISTRICT COURT

1) PAUL D. GREENE,

Plaintiff,

v.

1) CORNERSTONE SERVICE
CENTER, INC., d/b/a EXCELL HOME
CARE AND HOSPICE and
2) THE PENNANT GROUP, INC.,

Defendants.

Case No. 24-CV-217-MTS

ATTORNEY'S LIEN CLAIMED
JURY TRIAL DEMANDED

COMPLAINT

COMES NOW Plaintiff, Paul D. Greene, and for this his claims and causes of action against Defendants, Cornerstone Service Center, Inc., d/b/a, Excell Home Care and Hospice and The Pennant Group, Inc., states as follows:

1. This court has jurisdiction of the parties and the subject of this cause of action by virtue of 28 U.S.C. § 1331.

2. At all times material hereto, Plaintiff had medical and psychological conditions protected by the Americans with Disabilities Act ("ADA"), as amended, 42 U.S.C. §§12101, *et seq.* and Plaintiff was a veteran, protected by USERRA, 38 U.S.C. §§ 4301, *et seq.*

3. Plaintiff was employed with Defendants in 2021 - 2022 and fully capable of fulfilling his job duties, with or without accommodation.

4. During his employment with Defendants, Plaintiff was subjected to discrimination because of his disabilities acquired in the U.S. Armed Services, and endured a hostile work environment based thereon.

fees paid
2 summons

5. Plaintiff also complained to Defendants that they were discriminating against other employees based on their race.

6. Ultimately, Defendants terminated Plaintiff's employment based on his prior service, these disabilities, and his complaints of illegal discrimination.

7. As a result, Plaintiff has lost wages, endured emotional distress and has been otherwise damaged.

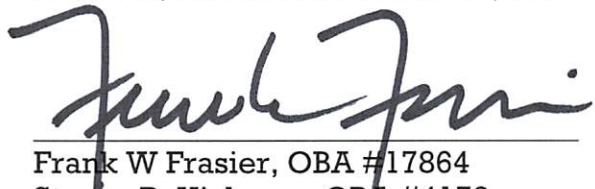
8. Plaintiff timely filed charges with the U.S. Equal Opportunity Employment Commission and has received his notice of right to sue. This action timely commences.

WHEREFORE, premises considered, Plaintiff prays for judgment against the Defendants for actual and punitive damages in a sum of One Million Dollars (\$1,000,000.00), attorney's fees, expert fees, and all costs of this action, injunctive relief, and any and all other relief to which he may be deemed entitled.

Respectfully submitted,

FRASIER, FRASIER & HICKMAN, LLP

By:



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